ATTACHMENT A

REMARKS

Considering the matters raised in the Office Action in the same order as raised, claims 1, 3, 5, 6, 33, 34, 36, 38, 41 and 44-51 have been rejected under 35 USC 103(a) as being unpatentable over Papa in view of Morita and Behl. This rejection is respectfully traversed although claims 1 and 34 have been amended to more even clearly distinguish over the cited references.

The Papa reference relates to computer system wherein a network server includes removable network interface modules mounted on a chassis. The network interface modules, which are indicated at 104 in Figure 4 (to which the Examiner has referred), connect to a CPU module, denoted 103, through an interconnection assembly module. The system includes a backplane board which is used for connecting the various chassis modules when the chassis modules are removably mounted on the chassis 170.

As shown in Figure 6 (to which the Examiner has also referred), the interface modules may comprise a canister which includes a plurality of interface card slots 562, a printed circuit board, and a pair of separately removable fans 566a and 566b.

In rejecting the claims, the Examiner has read the processor (in the recitation "said component comprising a processor") as component 104 ("component 104 comprising general interface card which may be a small computer system interface, SCSI controller as indicated in col. 8, lines 38-53, SCSI controller may include a processor"). The Examiner admits that "Papa fails to teach that a SCSI controller may include a processor" but contends that it "would have been obvious to one having ordinary skill in the art a SCSI controller may include a processor, since the Examiner takes Official notice that a SCSI controller may include a processor." The Examiner also states that if "the applicant choose to properly challenge the fact that a SCSI controller may include a processor, supportive document(s) will be provided upon request." The Office Action also states that "Papa also failed to teach the processor having a passive heat sink operably coupled thereto" but then further states that "Morita teaches a passive heat sink (44a, fig. 4) coupled to a processor (3601) for optimizing convective cooling." It is then concluded that it "would have been obvious to one having

ordinary skill in the art at the time the invention was made to modify the conduit of Papa with the heat sink taught by Morita for optimizing convective cooling."

It is respectfully submitted that there are several problems with the contentions set forth above. First, applicant challenges the Official Notice taken by the Examiner with respect to the SCSI controller of Papa including a processor. First, an interface controller need not include a processor. Moreover, in this case, the system already includes a CPU 103 as a separate unit. Further, and perhaps more importantly, as provided at the lines of column 8 to which the Examiner has made reference, Papa discloses a CSCI controller card, and this card is adapted to be mounted in one of the four interface card slots 562. Element 36-1 of Morita (which, as the Examiner correctly points out, may be a processor) is a discrete component mounted on a mother board 35. It is respectfully submitted that it simply would not be obvious to attempt to provide a passive heat sink for a printed circuit element of one of the cards of Papa, even assuming for the sake of argument that one of these elements could include a processor. The Examiner has failed to provide any showing of a card, such as that of the Papa, patent wherein a passive heat sink is provided for an element, much less a processor, on the card. It is respectfully submitted that given the actual teachings of the Papa and Morita references, the proposed combination here is necessarily the improper product of hindsight, and that that the claims define over the references for at least the reason that the references do not fairly teach a processor with a passive heat sink in the overall environment claimed.

Further, the Examiner is reading the first component of the claims as module 104 and the "further component" of the claims as "another 104, fig. 4." Claim 1 has been amended to recite that the second component is mounted to the at least one board outside of the previously recited isolation assembly and outside of any other isolation assembly so that "another 104" cannot be read as the "further component" claimed. In this regard, each component 104 comprises an "isolation assembly" (560) in the reading of the claims provided by the Examiner. Thus, the "another 104" of Papa would not be mounted to the at least one board "outside of said isolation assembly and outside of any other isolation assembly" as now claimed in claims 1 and 34.

In summary, for at least the reasons set forth above, it is respectfully submitted that claims 1 and 34, as amended, patentably define over the Papa, Morita and Behl patents.

Regarding the dependent claims, these claims are patentable for at least the reasons set forth above in support of the patentability of claims 1 and 34. In addition, it is not seen that any of the references disclose a conduit, separate from the first and second fans, and separate, at least in part, from the isolation assembly, in communication with the isolation assembly, as claimed in dependent claims 3 and 36 as newly amended. In this regard, the Examiner is reading the claimed "conduit" as "case 560" which is clearly not separated from but, in fact, forms part of the isolation assembly.

Allowance of the application in its present form is respectfully solicited.

END REMARKS